

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

IN RE:

FTX CRYPTOCURRENCY EXCHANGE
COLLAPSE LITIGATION

MDL No. 3076

C.A. No. 1:23-md-03076-KMM

THIS DOCUMENT RELATES TO:

Lahav et al. v. Binance Holdings Limited et al.,
No. 1:24-cv-21421-MOORE (PSLRA Class
Action)

**LEAD PLAINTIFF NIR LAHAV'S UNOPPOSED MOTION
FOR LEAVE TO FILE EXCESS PAGES**

Plaintiffs respectfully file this unopposed motion seeking an order from this Court establishing an agreed-upon page limitation for Plaintiffs' Oppositions to Defendants Binance Holdings Limited and Changpeng Zhao's ("CZ and Binance Defendants") Motion to Dismiss the Amended Complaint, (ECF No. 707) and to Defendants Bam Trading Services Inc. and Bam Management US Holdings Inc.'s ("the Binance US Defendants") Motion to Dismiss the First Amended Consolidated Class Action Complaint, (ECF No. 708) (collectively, "Motions to Dismiss"). Counsel for the Parties have conferred and agree to the relief requested herein.

1. Plaintiffs filed their First Amended Consolidated Class Action Complaint on May 21, 2024 (ECF No. 689).

2. CZ, Binance and the Binance US Defendants filed their Motions to Dismiss on July 24, 2024, and Plaintiffs' Oppositions are currently due September 26, 2024.

3. The Parties conferred and agreed to the following proposed page limitations for the Oppositions to Defendants' Motions to Dismiss:

- a. The Opposition to CZ and Binance Defendants' Motion to Dismiss shall not exceed 50 pages.
- b. The Opposition to the Binance US Defendants' Motion to Dismiss shall not exceed 26 pages.
- c. Defendants shall not exceed at least 50% of the requested pages for their respective replies.

CONCLUSION

4. Plaintiffs respectfully request that the Court grant their Unopposed Motion for Leave to File Excess Pages in their Oppositions to CZ and Binance and the Binance US Defendants' Motions to Dismiss. A Proposed Order is attached as Exhibit A.

Dated: September 26, 2024

DEVLIN LAW FIRM, LLC

/s/ Timothy Devlin

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*Attorneys for Lead Plaintiff and the Class
Nir Lahav on behalf of himself and all others
similarly situated*

CERTIFICATE OF GOOD FAITH CONFERRAL

Pursuant to Local Rule 7.1(a)(3)(A), the undersigned counsel certifies Lead Plaintiff Lahav's counsel conferred with Defendants Binance et al.'s counsel by email regarding the relief sought herein. Defendants' position is that more than reciprocal briefing is not necessary, but they are not objecting.

/s/ Timothy Devlin
Timothy Devlin
(DE 4241)

CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Timothy Devlin
Timothy Devlin
(DE 4241)